

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS NURSES  
ASSOCIATION,

Plaintiff

v.

NORTH ADAMS REGIONAL  
HOSPITAL,

Defendant

Civil Action No. 05-30145-MAP

**PLAINTIFF MASSACHUSETTS NURSES ASSOCIATION'S  
ASSENTED-TO MOTION TO ENLARGE DEADLINE FOR FILING OPPOSITION  
TO DEFENDANT'S MOTION FOR JUDGMENT ON THE PLEADINGS**

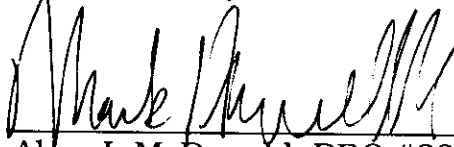
The Plaintiff, Massachusetts Nurses Association ("Association"), hereby moves for a one-week enlargement of the deadline for filing its Opposition to the Motion for Judgment on the Pleadings or, in the Alternative, For Summary Judgment filed by the Defendant, North Adams Regional Hospital to July 29, 2005. There is good cause to grant this Motion, as the undersigned will be on vacation for a significant portion of the time allotted by rule for a response, and as the enlargement requested is modest. The undersigned has conferred with

counsel for the Defendant by telephone on July 13, and counsel for the Defendant ASSENTED to this request.

Respectfully submitted

On behalf of the Plaintiff,  
Massachusetts Nurses Association

By its attorneys

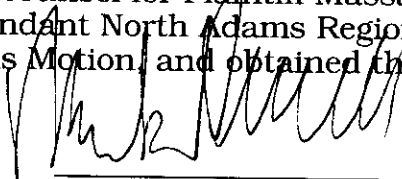


Alan J. McDonald, BBO #330960  
Mark A. Hickernell, BBO #638005  
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Southborough, MA 01772  
(508) 485-6600

Date: July 14, 2005

#### **RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(A)(2), counsel for Plaintiff Massachusetts Nurses Association conferred with Defendant North Adams Regional Hospital counsel, Robert Gordon, concerning this Motion, and obtained the Defendants assent thereto.

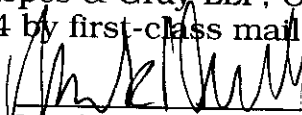


Date: July 14, 2005

Mark A. Hickernell

#### **CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2005, a true and accurate copy of the foregoing document was served upon counsel for the Defendant, Robert B. Gordon, Esq. and David C. Potter, Esq., Ropes & Gray LLP, One International Place, Boston Massachusetts 02110-2624 by first-class mail/postage prepaid.



Date: July 14, 2005

Mark A. Hickernell